

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

**PAULSON PRV HOLDINGS LLC; DUO
CONDADO JV HOLDINGS LLC; BAHIA
BEACH HOLDING COMPANY LLC; AIP
PR HOLDINGS LLC; SJ BEACH PR LLC;
and REGENCY ACQUISITION LLC,**

Plaintiffs,

vs.

**FAHAD GHAFAR; GLENDA ACEVEDO-
MARTINEZ; GLEN ACEVEDO; AMIR
CHAFAR; SAIRA GHAFAR; FARAH
VAYANI; NERISSA APONTE; THINKING
AHEAD LLC; GGSG LLC; COVERISQ
LLC; TYGATE PTE LTD.; and SYBER
GROUP LLC,**

Defendants.

Case No. 23-cv-1521 (SCC)

**Re: Civil RICO; Fraud; Breach of
Fiduciary Duty; Unjust Enrichment
and Damages**

Request for Trial by Jury

**MOTION REQUESTING A BRIEF ADDITIONAL AND FINAL EXTENSION
OF TIME TO FILE REPLY BRIEF**

TO THE HONORABLE COURT:

COMES NOW codefendant Nerissa Aponte (“Ms. Aponte”), through its undersigned attorney and very respectfully alleges, states, and prays as follows:

1. On October 1, 2024, Ms. Aponte requested a brief seven (7) day extension of time to file her Reply to Plaintiffs’ *Omnibus Response in Opposition to the Defendants’ Motions to Dismiss*. (See, D.E. ## 130 & 160.) This Honorable Court graciously granted her request and said term expires today, October 8th. (See, D.E. # 163.) Please note that Plaintiffs’ motion is complex and 117 pages long.
2. As previously mentioned, Ms. Aponte’s codefendants filed two (2) Reply Motions (Re: Reply to Opposition to the Appearing Parties’ Second Motion to Dismiss). (See, D.E. ## 157 and 158).

Her counsel has been working on her Reply but needs some additional time to complete the same while attending other pressing matters. Understandably, all of the filings are lengthy and complex, and Ms. Aponte believes that she can simplify matters as related to her.

3. Considering the aforementioned, Ms. Aponte very respectfully requests a *brief* additional and *final* seven (7) day extension of time to file her Reply Brief. If granted, said term would expire on Tuesday, October 15th. She adds that this request does not have any dilatory intent in mind and is rather needed to represent her fully.

WHEREFORE, Ms. Aponte very respectfully requests a *brief* additional and *final* seven (7) day extension of time to file her Reply Brief, or any other term which this Honorable Court deems proper. If the term requested were granted, it would expire on Tuesday, October 15th.

I HEREBY CERTIFY that on this date, I electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the parties of record.

RESPECTFULLY SUBMITTED.

In Guaynabo, Puerto Rico, this 8st day of October, 2024.

Trebilcock LLC
Metro Office Park
BDG 11, Suite 105a
Guaynabo, Puerto Rico 00968

s/Thomas Trebilcock-Horan
USDC - PR No. 220514
tt@trebilcockllc.com